

UNITED STATES DISTRICT COURT
Boston, Massachusetts

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Harold J. Weber

Plaintiff

vs.

BMW of North America, Inc.

Defendant

* * * * *

PLAINTIFFS ANSWERS

TO COUNTERCLAIMS

IN A CIVIL ACTION

Case No.

00cv10953 JLT

DOCKETED

PLAINTIFF'S ANSWERS TO COUNTERCLAIMS
PROPOUNDED BY DEFENDANTS

OVERVIEW

Defendants, BMW of North America, Inc., made entry of "BMW of North America, Inc.'s Answer to Complaint, Affirmative Defenses and Counterclaims" [10-1] on August 11, 2000 and including a request for relief.

ANSWERS TO COUNTERCLAIMS

Now comes the plaintiff, Harold J. Weber ("Weber") and respectfully answers the allegations set forth in the defendants' counterclaims [10-3] as follows:

11. Plaintiff **admits** references of paragraphs 1-10 of the Defendants' Answer as incorporated.

11.1 Paragraphs 1-7 are **denied** to the extent the Defendants have alleged contrary to the original complaint's corresponding Paragraphs 1-7.

11.2 Paragraph 8 is **denied**.

11.3 Paragraph 9 is **denied**.

11.4 Paragraph 10 is **denied**.

12. Denied.

13. Denied, except to **admit** jurisdiction under 28U.S.C. §1338.

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14. Admitted.

15. Admits belief to be correct information provided by Defendant, except **denies** knowledge of absolute correctness.

16. Admitted.

17. Admitted.

18. Admitted, except that the correct date was May 16, 2000.

19. Admitted.

20. Denied.

21. Denied.

22. Denied.

CONCLUSION

Plaintiff further states that considerable controversy exists wherein the plaintiff believes the defendants have infringed and continue to infringe a valid U.S. Patent 5,574,315 issued by the U.S. Patent Office on November 12, 1996 to the Plaintiff and hereby asks that the Court **deny** the "RELIEF REQUESTED" [10-4] in the Defendants' Paragraphs **A, B, C, D** and **E**.

August 17, 2000


Harold J. Weber
Plaintiff (pro se litigant)

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CERTIFICATION OF SERVICE

The undersigned pro se Plaintiff does hereby certify that on or before August 21, 2000 a copy of this *Plaintiff's Answers to Counterclaims* was served on the Defendant by mailing a true copy in an envelope deposited as first-class mail with the U.S. Postal Service, postage prepaid and addressed to the Defendant's known counsel Mr. Roger D. Taylor and Ms. Virginia L. Carron, Finnegan, Henderson, Farabow, Garrett & Dunner, LLP, 303 Peachtree Street, N.E., Atlanta, GA 30308.

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Harold J. Weber
Plaintiff (pro se litigant)

PLAINTIFF'S ANSWER TO COUNTERCLAIMS